

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Case No. 18-32106
ERIN ENERGY CORPORATION,	§	
	§	Chapter 11
Debtor.	§	
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In re:	§	
	§	Case No. 18-32107
ERIN ENERGY LIMITED,	§	
	§	Chapter 11
Debtor.	§	
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In re:	§	
	§	Case No. 18-32108
ERIN ENERGY KENYA LIMITED,	§	
	§	Chapter 11
Debtor.	§	
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In re:	§	
	§	Case No. 18-32109
ERIN PETROLEUM NIGERIA LIMITED,	§	
	§	Chapter 11
Debtor.	§	
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	§	Joint Administration Pending

NOTICE OF DESIGNATION AS COMPLEX CHAPTER 11 BANKRUPTCY CASE

The above captioned debtors and debtors in possession (collectively, the “Debtors”) each filed for bankruptcy on April 25, 2018. The undersigned party in interest believes that this case qualifies as a complex chapter 11 case because:

 √ The Debtors have total debt of more than \$10 million;

 √ There are more than 50 parties in interest in these cases;

√ The Debtors' equity is publicly traded;

 ✓ Other (Substantial explanation is required.) A significant portion of the Debtors' assets are located in foreign jurisdictions and a significant portion of the Debtors' assets are subject to liens granted under the laws of other countries.

Respectfully submitted on the 25th day of April, 2018.

Respectfully submitted,

OKIN ADAMS LLP

By: /s/ Matthew S. Okin

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PROPOSED ATTORNEYS FOR THE DEBTORS